

EXHIBIT “A”

Filing Attorney – Stephen F. Lombardi, Esq.
 Filing Attorney I.D. #018381980
 LOMBARDI & LOMBARDI, P.A.
 1862 Oak Tree Road
 P.O. Box 2065
 Edison, New Jersey 08818
 732-906-1500
 Attorneys for Plaintiffs
 File No.: 21-29922SFL

	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION
BRIAN CAFFREY,	:	MIDDLESEX COUNTY
an individual and MICHELLE A.	:	
CAFFREY, his wife, per quod,	:	
	:	DOCKET NO.: MID-L-3198-21
	:	
Plaintiffs	:	<u>CIVIL ACTION</u>
	:	
vs.	:	SUMMONS
	:	
McARTHUR EXPRESS INC., a	:	
business entity; JOHN DOE I-V,	:	
fictitiously named individuals	:	
and ABC CO., a fictitiously	:	
named business entity,	:	
	:	
Defendants	:	

From the State of New Jersey, To the Defendant (s) Named Above:

McARTHUR EXPRESS INC.

The plaintiff, named above, has filed a lawsuit in the Superior Court of New Jersey. The Complaint attached to this Summons states the basis for this lawsuit. If you dispute this Complaint, you or your attorney must file a written Answer or Motion and proof of service with the Deputy Clerk of the Superior Court in the county listed above within 35 days from the date you received this Summons, not counting the date you received it. (A directory of the addresses of each Deputy Clerk of the Superior Court is available in the Civil Division Management office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deputyclerklawref.pdf.) If the Complaint is one in foreclosure, then you must file your written Answer or Motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, CN-971, Trenton, New Jersey 08625. A filing fee* payable to the Clerk of the Superior Court and a completed Case Information Statement (available from the Deputy Clerk of the Superior Court) must accompany your Answer or Motion when it is filed. You must also send a copy of your Answer or Motion to plaintiff's attorney, whose name and address appear above, or to plaintiff if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written Answer or Motion (with fee of \$135.00 and completed Case Information Statement) if you want the Court to hear your defense.

If you do not file and serve a written Answer or Motion within 35 days, the Court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deputyclerklawref.pdf.

Michelle M. Smith
 Clerk of the Superior Court

Dated: May 27, 2021

Name of Defendant to be served: McARTHUR EXPRESS INC.

Address of Defendant to be served: 130 WERLICH DRIVE
 CAMBRIDGE ONTARIO, CANADA
 N1T 1N6

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	:	SUPERIOR COURT OF NEW JERSEY
BRIAN CAFFREY,	:	LAW DIVISION
an individual and MICHELLE A.	:	MIDDLESEX COUNTY
CAFFREY, his wife, per quod,	:	
	:	
	:	DOCKET NO.: MID-L-3198-21
	:	
Plaintiffs	:	<u>CIVIL ACTION</u>
	:	
vs.	:	COMPLAINT AND JURY DEMAND
	:	
McARTHUR EXPRESS INC., a	:	
business entity; JOHN DOE I-V,	:	
fictitiously named individuals	:	
and ABC CO., a fictitiously	:	
named business entity,	:	
	:	
Defendants	:	

Plaintiffs, Brian Caffrey, an individual and Michelle A. Caffrey, his wife, per quod, with regard to a cause of action arising in the Township of Sayreville, County of Middlesex, and State of New Jersey, and by way of Complaint and Jury Demand against all defendants, jointly and severally, say:

FIRST COUNT

1. On or about October 26, 2020, the plaintiff, Brian Caffrey, was engaged in a prudent and lawful manner, in the removal of items from a delivery truck at the premises commonly known as Upright Installation Services at 2600B Main Street Extension, in the Township of Sayreville, New Jersey.

2. On the date and at the place aforesaid, the defendant, John Doe I, a fictitiously named individual, was, as the agent, servant, and/or employee of the defendant, McArthur Express Inc., a business entity operating the delivery truck from which the plaintiff was lawfully and prudently removing items. Said delivery truck was the property of the defendant, McArthur Express Inc., a business entity.

3. On the date and at the place aforesaid, the defendant, John Doe I, a fictitiously named individual, as the agent, servant, and/or employee of the defendant, McArthur Express Inc., a business entity did maintain and operate said delivery truck in a negligent and unreasonable manner such that the plaintiff, Brian Caffrey, an individual, was caused to be expelled therefrom.

4. As a result of the negligence of the defendant, John Doe I, a fictitiously named individual, as the agent, servant, and/or employee of the defendant, McArthur Express Inc., a business entity, and the ensuing propulsion, the plaintiff, Brian Caffrey, an individual, did sustain bodily injury. He has suffered great pain of mind and body and will continue to so suffer in the future. He has been required to expend monies for the medical, hospital, and surgical care of his injuries. He has been prevented from attending to his normal and usual activities.

5. This claim is maintainable pursuant to the New Jersey Automobile Reparation Reform Act.

WHEREFORE, the plaintiff, Brian Caffrey, an individual, demands judgment against the defendants, jointly and severally, for compensatory damages together with interest and costs of suit.

SECOND COUNT

1. The plaintiffs repeat the allegations of the First Count as if same were set forth herein at length.

2. Michelle A. Caffrey, is the lawful spouse of the plaintiff, Brian Caffrey.

3. As a direct and proximate result of the carelessness and negligence of the defendant, John Doe I, a fictitiously named individual, as the agent, servant, and/or employee of the defendant, McArthur Express Inc., a business entity, Michelle A. Caffrey was and will be deprived of the aid, services, society, and consortium of her said husband.

WHEREFORE, the plaintiff, Michelle A. Caffrey, an individual, demands judgment against the defendants, jointly and severally, for compensatory damages together with interest and costs of suit.

THIRD COUNT

1. The plaintiffs repeat the allegations of the First Count and Second Count as if same were set forth herein at length.

2. John Doe and ABC Co. are fictitiously named defendants respectively representing any persons and/or business entities which had ownership and/or control of any of the instrumentalities of the damages complained of herein or who are otherwise liable for the damages complained of herein. The plaintiffs reserve their right to amend this Complaint to implead the names of such persons and/or business entities should the identity and/or liability of same be revealed during the course of discovery herein.

WHEREFORE, the plaintiffs demands judgment against the defendants, jointly and severally, for compensatory damages together with interest and costs of suit.

JURY DEMAND

Plaintiffs hereby demand a trial by jury of six (6) persons on all issues so triable.

CERTIFICATION

The undersigned certifies that to the best of his knowledge and belief, there is not pending any other action which arises from the incident alleged in the Complaint or which involves the parties to this action.

CERTIFICATION R.4:5-1 (b) (3)

The undersigned certifies that the within pleadings contains no personal confidential identifiers. The undersigned recognizes a responsibility to ensure the same as to subsequent pleadings.

DESIGNATION OF TRIAL COUNSEL

Pursuant to the provisions of R.4:25-4, Stephen F. Lombardi, Esq. is hereby designated as trial counsel.

LOMBARDI & LOMBARDI, P.A.
Attorneys for Plaintiffs


By: STEPHEN F. LOMBARDI

DATED: May 27, 2021

Civil Case Information Statement

Case Details: MIDDLESEX | Civil Part Docket# L-003198-21

Case Caption: CAFFREY BRIAN VS MCARTHUR
EXPRESS INC.

Case Initiation Date: 05/27/2021

Attorney Name: STEPHEN F LOMBARDI

Firm Name: LOMBARDI & LOMBARDI

Address: 1862 OAK TREE ROAD
EDISON NJ 088200000

Phone: 7329061500

Name of Party: PLAINTIFF : Caffrey, Brian

Name of Defendant's Primary Insurance Company
(if known): None

Case Type: AUTO NEGLIGENCE-PERSONAL INJURY (NON-
VERBAL THRESHOLD)

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same
transaction or occurrence)? NO

Are sexual abuse claims alleged by: Brian Caffrey? NO

Are sexual abuse claims alleged by: Michelle A Caffrey? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual
management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO Title 59? NO Consumer Fraud? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the
court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b)

05/27/2021
Dated

/s/ STEPHEN F LOMBARDI
Signed

NJ SUPERIOR COURT LAWYER REFERRAL AND LEGAL SERVICE LIST**ATLANTIC COUNTY:**

Deputy Clerk, Superior Court
Civil Division, Direct Filing
1201 Bacharach Blvd., 1st Fl.
Atlantic City, NJ 08401
LAWYER REFERRAL
(609) 345-3444
LEGAL SERVICES
(609) 348-4200

ESSEX COUNTY:

Deputy Clerk, Superior Court
Civil Customer Service
Hall of Records, Room 201
465 Dr. Martin Luther King Jr.
Blvd.
Newark, NJ 07102
LAWYER REFERRAL
(973) 622-6204
LEGAL SERVICES
(973) 624-4500

MONMOUTH COUNTY:

Deputy Clerk, Superior Court
Court House
P. O. Box 1269
Freehold, NJ 07728-1269
LAWYER REFERRAL
(732) 431-5544
LEGAL SERVICES
(732) 866-0020

SUSSEX COUNTY:

Deputy Clerk, Superior
Court
Sussex County Judicial
Center
43-47 High Street
Newton, NJ 07860
LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(973) 383-7400

BERGEN COUNTY:

Deputy Clerk, Superior Court
Civil Division, Room 115
Justice Center, 10 Main St.
Hackensack, NJ 07601
LAWYER REFERRAL
(201) 488-0044
LEGAL SERVICES
(201) 487-2166

GLOUCESTER COUNTY:

Deputy Clerk, Superior Court
Civil Case Management Office,
Attn: Intake, First Fl., Court
House
1 North Broad Street
Woodbury, NJ 08096
LAWYER REFERRAL
(856) 848-4589
LEGAL SERVICES
(856) 848-5360

MORRIS COUNTY:

Morris County Courthouse
Civil Division
Washington & Court Streets
P. O. Box 910
Morristown, NJ 07963-0910
LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(973) 285-6911

UNION COUNTY:

Deputy Clerk, Superior
Court
1st Floor, Court House
2 Broad Street
Elizabeth, NJ 07207-
6073
LAWYER REFERRAL
(908) 353-4715
LEGAL SERVICES
(908) 354-4340

BURLINGTON COUNTY:

Deputy Clerk, Superior Court
Central Processing Office
Attn: Judicial Intake
First Fl., Courts Facility
49 Rancocas Road
Mt. Holly, NJ 08060
LAWYER REFERRAL
(609) 261-4862
LEGAL SERVICES
(609) 261-1088

HUDSON COUNTY:

Deputy Clerk, Superior Court
Civil Records Dept.
Brennan Court House, 1st Floor
583 Newark Avenue
Jersey City, NJ 07306
LAWYER REFERRAL
(201) 798-2727
LEGAL SERVICES
(201) 792-6363

OCEAN COUNTY:

Deputy Clerk, Superior Court
Court House, Room 121
118 Washington Street
P.O. Box 2191
Toms River, NJ 08754-2191
LAWYER REFERRAL
(732) 240-3666
LEGAL SERVICES
(732) 341-2727

WARREN COUNTY:

Deputy Clerk, Superior
Court
Civil Division, Court
House
413 Second Street
Belvidere, NJ 07823-
1500
LAWYER REFERRAL
(908) 859-4300
LEGAL SERVICES
(908) 475-2010

CAMDEN COUNTY:

Deputy Clerk, Superior Court
Civil Processing Office
Hall of Justice
1st Fl, Suite 150
101 South 5th Street
Camden, NJ 08103
LAWYER REFERRAL
(856) 482-0618
LEGAL SERVICES
(856) 964-2010

HUNTERDON COUNTY:

Deputy Clerk, Superior Court
Civil Division
65 Park Avenue
Flemington, NJ 08822
LAWYER REFERRAL
(908) 236-6109
LEGAL SERVICES
(908) 782-7979

PASSAIC COUNTY:

Deputy Clerk, Superior Court
Civil Division - Court House
77 Hamilton Street
Paterson, NJ 07505
LAWYER REFERRAL
(973) 278-9223
LEGAL SERVICES
(973) 523-2900

CAPE MAY COUNTY:

Deputy Clerk, Superior Court
9 N. Main Street
Cape May Court House, NJ
08210
LAWYER REFERRAL
(609) 463-0313
LEGAL SERVICES
(609) 465-3001

MERCER COUNTY:

Deputy Clerk, Superior Court
Local Filing Office, Courthouse
175 S. Broad Street
P. O. Box 8068
Trenton, NJ 08650
LAWYER REFERRAL
(609) 585-6200
LEGAL SERVICES
(609) 695-6249

SALEM COUNTY:

Deputy Clerk, Superior Court
Attn: Civil Case Management
Office
92 Market Street
Salem, NJ 08079
LAWYER REFERRAL
(856) 935-5629
LEGAL SERVICES
(856) 691-0494

CUMBERLAND COUNTY:

Deputy Clerk, Superior Court
Civil Case Management Office
60 West Broad Street
P. O. Box 10
Bridgeton, NJ 08302
LAWYER REFERRAL
(856) 696-5550
LEGAL SERVICES
(856) 691-0494

MIDDLESEX COUNTY:

Deputy Clerk, Superior Court
Middlesex Vicinage
Second Floor, Tower
56 Paterson Street
P. O. Box 2633
New Brunswick, NJ 08903-2633
LAWYER REFERRAL
(732) 828-0053
LEGAL SERVICES
(732) 249-7600

SOMERSET COUNTY:

Deputy Clerk, Superior Court
Civil Division Office
40 North Bridge Street
P. O. Box 3000
Somerville, NJ 08876
LAWYER REFERRAL
(908) 685-2323
LEGAL SERVICES
(908) 231-0840